

**BARCLAY DAMON** <sup>LLP</sup>

**Benjamin R. Zakarin**  
*Associate*

April 17, 2024

**VIA ECF**

Hon. Rukhsanah L. Singh  
United States Magistrate Judge  
U.S. District Court for the District of New Jersey  
402 East State Street  
Room 2020  
Trenton, New Jersey 08608

Re: *Freedom Funding Group, Inc. v. The Freedom Fundinggroup L.L.C., et al.*,  
Case No. 3:20-cv-18404 - Request to Restore Case

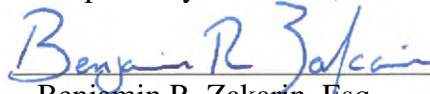
Dear Judge Singh:

Barclay Damon LLP represents Plaintiff, Freedom Funding Group, Inc. (“Plaintiff”) in the above-referenced matter. I write in reference to the March 21, 2024 Status Conference (the “Conference”) and Plaintiff’s Motion to Reopen the Case (ECF No. 103) (the “Motion”). As Your Honor may recall, the purpose of the Conference was to address Plaintiff’s Motion filed pursuant to Rule 60(b) and as permitted by the Court’s February 29, 2024 Order (ECF No. 101). During the Conference, Your Honor expressed the Court’s intent to grant the Motion but, in the interest of fairness, advised that you would first allow defendants Gordon and Firestone to submit their position on the Motion in writing.

To date, neither defendant Gordon nor Firestone has submitted any such written statement on the active docket. Moreover, I have not received any communications from either defendant since the Conference relating to the Motion specifically or this matter as a whole. In light of this lack of written statement from either defendant, Plaintiff respectfully requests that this Court enter an Order restoring this matter to “active” status on the docket and proceed to the Court’s proposed review of Plaintiff’s previously-submitted supplemental damages briefing (ECF No. 66). Counsel for Plaintiff will gladly make itself available for any further conference before Your Honor in connection with this matter.

We thank Your Honor for the Court’s attention to this matter.

Respectfully submitted,

  
Benjamin R. Zakarin, Esq.  
*Counsel for Plaintiff*

cc: Mssrs. Gordon and Firestone (via email)